

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

| | | |
|--|---|--------------------------|
| KIRK RAAB, |) | |
| |) | |
| Plaintiff, |) | Case No.: 08 C 50087 |
| |) | |
| v. |) | Judge Reinhard |
| |) | |
| COUNTY OF JO DAVIESS, JO DAVIESS |) | Magistrate Judge Mahoney |
| COUNTY SHERIFF'S OFFICE, SHERIFF |) | |
| LEO HEFEL in his official capacity as |) | |
| Sheriff of Jo Daviess County and his |) | |
| Individual capacity, CHIEF DEPUTY |) | |
| COLIN FULRATH, in his official capacity |) | |
| DONALD SCHWEIHS, in his official |) | |
| Capacity as County of Jo Daviess Public |) | |
| Defender and in his individual capacity, |) | |
| |) | |
| Defendants. |) | |

MOTION FOR EXTENSION OF TIME

Defendants, County of Jo Daviess, Jo Daviess County Sheriff's Office, Sheriff Leo Hefel, Chief Deputy Colin Fulrath, and Donald Schweihs, by their attorneys, Julie A. Bruch and O'Halloran Kosoff Geitner & Cook, LLC, move for an extension of time to respond to plaintiff's Complaint. In support of this motion, defendants state as follows:

1. Plaintiff filed a Complaint against defendants on May 19, 2008. Defendants were served on or about May 29, 2008.
2. Defendants request additional time to July 3, 2008, in which to file their responsive pleading.
3. Additional time is necessary to allow counsel for the defendants an opportunity to investigate the facts surrounding the issues raised in the complaint so that an accurate and informed response can be made to the allegations in plaintiff's complaint.
4. No prejudice will result to the plaintiff from this short extension.

5. Plaintiff's counsel has agreed to this motion.

WHEREFORE, defendants, County of Jo Daviess, Jo Daviess County Sheriff's Office, Sheriff Leo Hefel, Chief Deputy Colin Fulrath, and Donald Schweihs, respectfully request that this Honorable Court grant them to July 3, 2008 to respond to Plaintiff's Complaint.

COUNTY OF JO DAVIESS, JO DAVIESS
COUNTY SHERIFF'S OFFICE, SHERIFF LEO
HEFEL, CHIEF DEPUTY COLIN FULRATH,
DONALD SCHWEIHS

By: s/Julie A. Bruch
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| Capacity as County of Jo Daviess Public |) | |
| Defender and in his individual capacity, |) | |
| |) | |
| Defendants. |) | |

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2008, I electronically filed Defendants' Motion for Extension of Time with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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COUNTY SHERIFF'S OFFICE, SHERIFF LEO
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